

My name is George McCouch and I am commenting on RM-11305

I have been a ham for 41 years and have held every Amateur Radio license that has been issued by the FCC during that time period. I have also held a commercial Radiotelephone license. I presently hold the Extra class license with the call of K3UD. Professionally I am a market researcher and research analyst.

At first read RM-11305 seems attractive. It would characterize all of our allocated spectrum (with the exception of 60 meters) as a wide-open range where any and all modes can, regardless of bandwidth and compatibility, use any frequency that is available to the operator depending on their license privileges.

However, when one takes a closer look another picture begins to emerge. So called automatic and semi automatic digital operations can also pop up anywhere they want to, including frequencies that are in use but cannot be detected by the control op of the automated digital robot itself. This will happen because of the variances of propagation that every Amateur Radio operator is familiar with on our HF bands. The robots can and will pop up and camp out on frequencies that are in use because they cannot detect a signal that is on frequency but cannot be copied. In the end the QSO in progress gets interfered with and there will be no easy way to identify the interference and the station control operator and let him inform know that their station is interfering with the QSO.

Because there are no real limits (in RM-11305) on the bandwidth that could be used on our bands, we will now face the specter of ultra wide modes gobbling up increasingly wide areas of our HF bands. While the CTT group has endorsed (to some extent) the creation of so called Gentleman's Agreements where different operations will be somewhat segregated, they will not carry the force of law. A good example of this is what happens on 160 meters during an operating event.

The Gentleman's Agreements on 160 meters have long been established and to a great extent are followed during periods of normal operations. However, when an operating event occurs on 160 the agreements fly out the window and it turns into a free for all. The Hams who are active in the 160 event just disregard the agreements and populate the band with mixed modes from end to end because they can since there are no actual regulations that says they can not do otherwise.

What we have with RM-11305 is really a request of a completely wide-open range without a Sheriff or any regulations concerning incompatibility, ID of stations, interference remedies, and limits on bandwidth being used. While this sounds utopian and the authors of RM-11305 really believe that everyone will play nice and not engage in spectrum grabbing for his or her 25 kHz (or more) digital mode or broadcast quality FM mode, human nature will dictate against it.

For these reasons I do not think that this petition is ready for prime time and as such request that the FCC not act favorably on the RM-11305 petition.

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